

IN THE UNITED STATES BANKRUPTCY COURT

IN AND FOR THE DISTRICT OF DELAWARE

In Re: : CHAPTER 11
:
W.R. GRACE & CO. : CASE NO. 01-01139 (JJF)
:
: Objections Due By: October 30, 2001
Debtor, : Hearing Date: November 5, 2001

**NOTICE OF MOTION OF TOYOTA MOTOR CREDIT CORPORATION
FOR ORDER FIXING TIME BY WHICH DEBTOR MUST
ASSUME OR REJECT UNEXPIRED LEASES; OR IN THE
ALTERNATIVE, FOR RELIEF FROM THE SECTION 362 AUTOMATIC STAY**

To: The Persons on the Attached Service List

Toyota Motor Credit Corporation has filed a Motion for Order Fixing Time by which Debtor must assume or reject unexpired leases; or in the alternative, for relief from the Section 362 Automatic Stay.

Hearing on the Motion is scheduled for November 5, 2001 @ 2:00 p.m.

You are required to file a response and the supporting documentation required by Local Rule 4001-1(d) to the attached motion at least five business days before the above hearing date.

At the same time, you must also serve a copy of the response upon Movant's attorneys:

Robert T. Aulgur, Jr.
Kristi J. Doughty
Whittington & Aulgur
313 North Dupont Hwy., Suite 110
P.O. Box 617
Odessa, DE 19730

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent of any security instrument.

By: /s/ Kristi J. Doughty
Counsel for Toyota Motor Credit
Corporation

